

EXHIBIT A

to

EXHIBIT B

on

Joint Statement on
Defendant's Motion for
Attorneys' Fees

6075823													
6075825													
6075831													
6075833													
6075834	5/10/2022	51 Borcia, James K.	12549	1	\$29.50	467457	6/13/2023	\$29.50	Billed	0.1	0.1		Review court order in Walmart case
6075845													
6075860													
6075863	5/6/2022	51 Borcia, James K.	12549	1	\$236.00	467457	6/13/2023	\$236.00	Billed	0.8	0.8		Review plaintiff's motion to compel Walmart to pay filing fees and cases cited therein
6075864													
6075866													
6075869													
6075878	5/5/2022	51 Borcia, James K.	12549	1	\$29.50	467656	6/14/2023	\$29.50	Billed	0.1	0.1		Review court order on plaintiff's motion for reconsideration
6075880	5/5/2022	51 Borcia, James K.	12549	1	\$88.50	467457	6/13/2023	\$88.50	Billed	0.3	0.3		Review plaintiff's first request for production and interrogatories to Walmart; communications with client reps re same
6075885	5/5/2022	51 Borcia, James K.	12549	1	\$118.00	467457	6/13/2023	\$118.00	Billed	0.4	0.4		Review plaintiff's motion to compel Walmart to pay filing fees
6075887													
6075889													
6075890													
6076756													
6076773	5/20/2022	51 Borcia, James K.	12549	1	\$236.00	467457	6/13/2023	\$236.00	Billed	0.8	0.8		Prepare initial disclosures for Walmart case; communications with client re same
6076774													
6076777													
6076871													
6076932	5/17/2022	51 Borcia, James K.	12549	1	\$236.00	467656	6/14/2023	\$236.00	Billed	0.8	0.8		Communications with client reps re strategy in proceeding
6077112													
6077136													
6077144	5/10/2022	51 Borcia, James K.	12549	1	\$118.00	467656	6/14/2023	\$118.00	Billed	0.4	0.4		Prepare status email to clients on filing fee payment issues
6077197	5/6/2022	51 Borcia, James K.	12549	1	\$88.50	467656	6/14/2023	\$88.50	Billed	0.3	0.3		Prepare status email to client reps re plaintiff's motion to reconsider
6095440													
6095456													
6096121	6/28/2022	51 Borcia, James K.	12549	1	\$59.00	467656	6/14/2023	\$59.00	Billed	0.2	0.2		Communications with plaintiff's counsel re discovery issues
6096715													
6096784	6/9/2022	51 Borcia, James K.	12549	1	\$413.00	467457	6/13/2023	\$413.00	Billed	1.4	1.4		Prepare protective order for WalMart case and communications with client and opposing counsel re same
6096850													
6096896	6/6/2022	51 Borcia, James K.	12549	1	\$413.00	467457	6/13/2023	\$413.00	Billed	1.4	1.4		Finalize and serve our responses to plaintiff's document requests and interrogatories to WalMart; communications with client reps re same
6096917	6/3/2022	51 Borcia, James K.	12549	1	\$265.50	467457	6/13/2023	\$265.50	Billed	0.9	0.9		Communications with client WalMart re discovery issues; review proposed document production re same
6096945	6/2/2022	51 Borcia, James K.	12549	1	\$59.00	467656	6/14/2023	\$59.00	Billed	0.2	0.2		Prepare email to client reps re discovery to Plaintiff
6096965	6/1/2022	51 Borcia, James K.	12549	1	\$88.50	467656	6/14/2023	\$88.50	Billed	0.3	0.3		Prepare status email to clients
6118127	7/21/2022	51 Borcia, James K.	12549	1	\$29.50	467457	6/13/2023	\$29.50	Billed	0.1	0.1		Review court order on Walmart case
6118136													
6118142	7/14/2022	51 Borcia, James K.	12549	1	\$206.50	467460	6/13/2023	\$206.50	Billed	0.7	0.7		Prepare discovery progress reports in Walmart and Posterazzi cases; communications with plaintiff's counsel re same
6118143													
6118149													
6118291													
6118357	7/20/2022	51 Borcia, James K.	12549	1	\$236.00	467457	6/13/2023	\$236.00	Billed	0.8	0.8		Work on Walmart responses to plaintiff's second set of discovery requests; communications with client rep re same
6118483	7/11/2022	51 Borcia, James K.	12549	1	\$354.00	467656	6/14/2023	\$354.00	Billed	1.2	1.2		Review plaintiff's interrogatories and document requests to all clients; prepare email to client reps re same and status of case
6130540													
6130553													
6130648													
6130682													
6131934													
6132981													
6158583													
6158601	9/8/2022	51 Borcia, James K.	12549	1	\$29.50	467457	6/13/2023	\$29.50	Billed	0.1	0.1		Review court order on motion to compel in Walmart case
6158604													
6158667	9/30/2022	51 Borcia, James K.	12549	1	\$531.00	467656	6/14/2023	\$531.00	Billed	1.8	1.8		Work on responses to plaintiff's interrogatories and document requests; communications with client reps re same
6158691	9/28/2022	51 Borcia, James K.	12549	1	\$88.50	467656	6/14/2023	\$88.50	Billed	0.3	0.3		Communications with opposing counsel re discovery issues
6158849	9/9/2022	51 Borcia, James K.	12549	1	\$59.00	467656	6/14/2023	\$59.00	Billed	0.2	0.2		Communications with plaintiff's counsel re discovery issues

Prepare status report in Walmart case, communications with opposing counsel re same; review court orders in Posterazzi and Walmart cases

6308828	5/26/2023	51 Borcia, James K.	12549	1	\$236.00	490319	7/15/2024	\$236.00	Billed	0.3	0.3	Work on status report for Walmart case; communications with plaintiff's counsel re same
6321074												
6322306	6/23/2023	787 Ramos, Jonathan, M.	12549	1	\$25.00	490319	7/15/2024	\$25.00	Billed	0.2	0.2	Contact court reporter regarding depositions of Charles and Judy Giovanelli.
6329857												
6329898	6/27/2023	51 Borcia, James K.	12549	1	\$59.00	490304	7/15/2024	\$59.00	Billed	0.2	0.2	Review court order referring case to Magistrate; review Magistrate's orders on pending motion to compel
6329905												
6329912												
6329918												
6329925												
6329931												
6329936												
6330030	6/7/2023	51 Borcia, James K.	12549	1	\$206.50	490305	7/15/2024	\$206.50	Billed	0.7	0.7	Finalize Walmart's answer to plaintiff's amended complaint
6330039												
6330343	6/29/2023	51 Borcia, James K.	12549	1	\$118.00	490304	7/15/2024	\$118.00	Billed	0.4	0.4	Attend court appearance re hearing on status and plaintiff's motion to compel
6330474	6/28/2023	51 Borcia, James K.	12549	1	\$206.50	490319	7/15/2024	\$206.50	Billed	0.7	0.7	Prepare response to plaintiff's settlement offer and communications with judge re same
6330734	6/26/2023	51 Borcia, James K.	12549	1	\$1,327.50	490319	7/15/2024	\$1,327.50	Billed	4.5	4.5	Prepare for and take the depositions of Judy and Charles Giovanelli
6330746												
6330788	6/26/2023	51 Borcia, James K.	12549	1	\$88.50	490319	7/15/2024	\$88.50	Billed	0.3	0.3	Communications with clients re plaintiff's settlement demand and responding to same
6330868												
6330978	6/22/2023	51 Borcia, James K.	12549	1	\$826.00	490306	7/15/2024	\$826.00	Billed	2.8	2.8	Prepare for and produce client rep Ryan Rosotto for his deposition
6331000												
6331110	6/20/2023	51 Borcia, James K.	12549	1	\$0.00	490319	7/15/2024	\$0.00	Billed	0.0	0.0	Review additional documents from client reps; produce same to opposing counsel
6331122												
6331137												
6331152	6/19/2023	51 Borcia, James K.	12549	1	\$324.50	490306	7/15/2024	\$324.50	Billed	1.1	1.1	Prepare client rep Ryan Rosotto for his deposition
6331159	6/19/2023	51 Borcia, James K.	12549	1	\$59.00	490306	7/15/2024	\$59.00	Billed	0.2	0.2	Communications with opposing counsel re Rosotto deposition
6331202	6/16/2023	51 Borcia, James K.	12549	1	\$59.00	490306	7/15/2024	\$59.00	Billed	0.2	0.2	Review plaintiff's notice of deposition of Ryan Rosotto; communications with plaintiff's counsel re same
6331268	6/14/2023	51 Borcia, James K.	12549	1	\$59.00	490319	7/15/2024	\$59.00	Billed	0.2	0.2	Review plaintiff's settlement demand
6331285												
6331493	6/9/2023	51 Borcia, James K.	12549	1	\$236.00	490319	7/15/2024	\$236.00	Billed	0.8	0.8	Review plaintiff's request for Rule 30b6 depositions and communications with client reps re same
6331617	6/6/2023	51 Borcia, James K.	12549	1	\$88.50	490305	7/15/2024	\$88.50	Billed	0.3	0.3	Work on answer in Walmart case and communications with client reps re same
6331662												
6340574	7/18/2023	787 Ramos, Jonathan, M.	12549	1	\$12.50	490319	7/15/2024	\$12.50	Billed	0.1	0.1	Contact court reporter regarding deposition of Ionela Giovanelli.
6348498												
6348504												
6348510												
6348511	7/28/2023	51 Borcia, James K.	12549	1	\$0.00	490319	7/15/2024	\$0.00	Billed	0.0	0.0	Review plaintiffs' motions to set expert discovery schedule as to Walmart case
6348518												
6348521												
6348524	7/24/2023	51 Borcia, James K.	12549	1	\$29.50	490305	7/15/2024	\$29.50	Billed	0.1	0.1	Review court scheduling order on Walmart case
6348569	7/18/2023	51 Borcia, James K.	12549	1	\$88.50	490305	7/15/2024	\$88.50	Billed	0.3	0.3	Prepare status report for Walmart case; communications with plaintiff's counsel re same
6348594												
6348603	7/11/2023	51 Borcia, James K.	12549	1	\$29.50	490305	7/15/2024	\$29.50	Billed	0.1	0.1	Review court order on Walmart case
6348610												
6348611	7/10/2023	51 Borcia, James K.	12549	1	\$29.50	490305	7/15/2024	\$29.50	Billed	0.1	0.1	Review court order on plaintiff's motion to compel in Walmart case
6348617	7/10/2023	51 Borcia, James K.	12549	1	\$59.00	490305	7/15/2024	\$59.00	Billed	0.2	0.2	Review court orders in Walmart case
6348626	7/7/2023	51 Borcia, James K.	12549	1	\$118.00	490305	7/15/2024	\$118.00	Billed	0.4	0.4	Prepare status report for Walmart case; communications with plaintiff's counsel re same
6348836	7/31/2023	787 Ramos, Jonathan, M.	12549	1	\$25.00	490319	7/15/2024	\$25.00	Billed	0.2	0.2	Follow up with court reporter regarding delivery of plaintiff's deposition transcript.
6348861												
6349020												
6349035	7/26/2023	51 Borcia, James K.	12549	1	\$88.50	490306	7/15/2024	\$88.50	Billed	0.3	0.3	Communications with client rep re status; send him documents per his request; review his deposition errata re same
6349132	7/26/2023	787 Ramos, Jonathan, M.	12549	1	\$12.50	490306	7/15/2024	\$12.50	Billed	0.1	0.1	Email signed Ryan Rosotto errata to court reporter.
6349151												
6349229												
6349270												
6349343	7/28/2023	787 Ramos, Jonathan, M.	12549	1	\$25.00	490319	7/15/2024	\$25.00	Billed	0.2	0.2	Follow up with court reporter regarding status of plaintiff's deposition transcript delivery.
6349362	7/19/2023	51 Borcia, James K.	12549	1	\$708.00	490319	7/15/2024	\$708.00	Billed	2.4	2.4	Prepare for and take deposition of Ionela Giovanelli
6349573	7/21/2023	787 Ramos, Jonathan, M.	12549	1	\$12.50	490319	7/15/2024	\$12.50	Billed	0.1	0.1	Contact court reporter to request ETA of plaintiff's transcript.

6349585	7/7/2023	51 Borcia, James K.	12549	1	\$59.00	490305	7/15/2024	\$59.00	Billed	0.2	0.2	Telephone conference with plaintiff's counsel re meeting and confer on Walmart case
6349775	7/3/2023	51 Borcia, James K.	12549	1	\$88.50	490305	7/15/2024	\$88.50	Billed	0.3	0.3	Prepare status report for Walmart case and communications with plaintiff's counsel re same
6349855	7/13/2023	787 Ramos, Jonathan, M.	12549	1	\$12.50	490319	7/15/2024	\$12.50	Billed	0.1	0.1	Submit order for plaintiff's deposition transcript.
6369141	8/4/2023	51 Borcia, James K.	12549	1	\$29.50	490305	7/15/2024	\$29.50	Billed	0.1	0.1	Review court order on plaintiff's motion to set expert schedule in Walmart case
6369524	8/2/2023	51 Borcia, James K.	12549	1	\$0.00	490319	7/15/2024	\$0.00	Billed	0.0	0.0	Prepare for and attend hearing on plaintiff's motion to set expert discovery schedule; communications with client re same
6371874	8/1/2023	787 Ramos, Jonathan, M.	12549	1	\$25.00	490319	7/15/2024	\$25.00	Billed	0.2	0.2	Receive Giovanelli deposition transcript and incorporate into file for review.
6390063	9/15/2023	51 Borcia, James K.	12549	1	\$826.00	490305	7/15/2024	\$826.00	Billed	2.8	2.8	Finalize our motion for summary judgment and statement of facts and memorandum in support; communications with client reps re same
6390065	9/14/2023	51 Borcia, James K.	12549	1	\$1,003.00	490305	7/15/2024	\$1,003.00	Billed	3.4	3.4	Prepare motion for summary judgment and statement of facts and memorandum in support; research to support same
6391163	9/20/2023	51 Borcia, James K.	12549	1	\$29.50	490305	7/15/2024	\$29.50	Billed	0.1	0.1	Prepare email to carrier rep re summary judgment motion for Walmart
6391536	9/18/2023	51 Borcia, James K.	12549	1	\$88.50	490306	7/15/2024	\$88.50	Billed	0.3	0.3	Telephone conference with insurer representative re status and strategy in proceeding
6391701	9/17/2023	51 Borcia, James K.	12549	1	\$29.50	490305	7/15/2024	\$29.50	Billed	0.1	0.1	Prepare status email to Walmart client
6410619	10/19/2023	787 Ramos, Jonathan, M.	12549	1	\$25.00	490319	7/15/2024	\$25.00	Billed	0.2	0.2	Conduct public records search for new contact information for Saif Khan.
6411723	10/11/2023	787 Ramos, Jonathan, M.	12549	1	\$37.50	490319	7/15/2024	\$37.50	Billed	0.3	0.3	Receive voluminous expert materials from Craig Tobin and prepare on shared cloud link for review.
6412172	10/30/2023	51 Borcia, James K.	12549	1	\$796.50	490305	7/15/2024	\$796.50	Billed	2.7	2.7	Review plaintiff's opposition to our motion for summary judgment in Walmart case, response to our fact statement and statement of additional facts
6412241	10/27/2023	787 Ramos, Jonathan, M.	12549	1	\$12.50	490303	7/15/2024	\$12.50	Billed	0.1	0.1	Receive deposition transcript of Ferrazano and incorporate into file for review.
6413168	10/5/2023	787 Ramos, Jonathan, M.	12549	1	\$12.50	490303	7/15/2024	\$12.50	Billed	0.1	0.1	Contact court reporter for Ferrazano deposition in regards to transcript order.
6413174	10/4/2023	787 Ramos, Jonathan, M.	12549	1	\$12.50	490306	7/15/2024	\$12.50	Billed	0.1	0.1	Contact court reporter for Rossotto deposition in regards to transcript order.
6413419	10/25/2023	51 Borcia, James K.	12549	1	\$354.00	490306	7/15/2024	\$354.00	Billed	1.2	1.2	Communications with and provide requested documents to carrier rep
6413616	10/19/2023	51 Borcia, James K.	12549	1	\$88.50	490306	7/15/2024	\$88.50	Billed	0.3	0.3	Communications with client rep re status and strategy in proceeding
6413788	10/17/2023	51 Borcia, James K.	12549	1	\$206.50	490306	7/15/2024	\$206.50	Billed	0.7	0.7	Communications with client rep re status and send him documents requested
6414470	10/4/2023	51 Borcia, James K.	12549	1	\$59.00	490319	7/15/2024	\$59.00	Billed	0.2	0.2	Communications with plaintiff's counsel re treating physician deposition
6437740	11/29/2023	51 Borcia, James K.	12549	1	\$29.50	490319	7/15/2024	\$29.50	Billed	0.1	0.1	Review court order on our motion for protective order
6437742	11/22/2023	51 Borcia, James K.	12549	1	\$206.50	490319	7/15/2024	\$206.50	Billed	0.7	0.7	Prepare motion for entry of qualified protective order and proposed protective order

[illegible]

6588076	6/16/2023	51 Borcia, James K.	12549	1	\$29.50	490302	7/15/2024	\$29.50	Billed	0.1	0.1	Review plaintiff's motion to compel in Walmart case
6588083	6/20/2023	51 Borcia, James K.	12549	1	\$29.50	490306	7/15/2024	\$29.50	Billed	0.1	0.1	Review additional documents from client reps; produce same to opposing counsel
6588084	6/20/2023	51 Borcia, James K.	12549	1	\$59.00	490303	7/15/2024	\$59.00	Billed	0.2	0.2	Review additional documents from client reps; produce same to opposing counsel
6588159	7/28/2023	51 Borcia, James K.	12549	1	\$29.50	490304	7/15/2024	\$29.50	Billed	0.1	0.1	Review plaintiffs' motions to set expert discovery schedule as to Walmart case
6588207	8/2/2023	51 Borcia, James K.	12549	1	\$88.50	490301	7/15/2024	\$88.50	Billed	0.3	0.3	Prepare for and attend hearing on plaintiff's motion to set expert discovery schedule; communications with client re same
6599559	7/11/2024	51 Borcia, James K.	12549	1	\$29.50	0		\$0.00	WIP	0.1	0.0	Review court order in Walmart case
6629024	8/14/2024	51 Borcia, James K.	12549	1	\$59.00	0		\$0.00	WIP	0.2	0.0	Communications with client rep re potential counterclaims

